

**AVERMENT OF COUNSEL PURSUANT TO LOCAL RULE 7.1.1**

I, Stephen G. Grygiel, co-counsel for plaintiff Ana Yngelmo and proposed interim co-lead counsel for the class, make this Averment of Counsel pursuant to Local Rule 7.1.1.

As set forth in the accompanying Memorandum of Law in Support of Motion for Consolidation and Appointment of Interim Lead Counsel, I, with Brian Strange, another proposed interim co-lead counsel for the class, made reasonable although unsuccessful efforts to reach agreement with counsel for non-moving plaintiffs about class counsel leadership in this case.

In addition, I yesterday emailed counsel for Defendant Google to determine whether Defendant Google will take a position on the Motion for Consolidation and Appointment of Interim Lead Counsel, and, if so, what that position is. I have not received a response, and will advise the Court and all counsel as soon as I do.

/s/ Stephen G. Grygiel  
Stephen G. Grygiel (Del. Bar No. 4944)  
*Co-Counsel for Plaintiff Ana Yngelmo and Proposed  
Interim Co-Lead Counsel*